

THE KAPLAN LAW OFFICE
30 WALL STREET, 8th FLOOR
NEW YORK, NEW YORK 10005

SUSAN KAPLAN, PhD, ESQ.

TEL. 347-683-2505

skaplan@lawkaplan.com

CHARLES CARANICAS, ESQ.

TEL. 347-432-1463

caranicas@lawkaplan.com

September 16, 2021

VIA ECF

Hon. Cheryl L. Pollak
Chief Magistrate Judge
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
225 Cadman Plaza East
Chambers Room 1230
Brooklyn, New York, 11201

Re: Ana Pichardo v. Otilie Residential Treatment Facility, et al; 21-CV-3150

Dear Judge Pollak:

We represent Plaintiff in the above-referenced matter. We submit the instant status report letter pursuant to the Court's Order dated August 16, 2021.

The Complaint has been served on all Defendants except Luvasia Rodriguez. The dates of service on each Defendant were:

<u>Party</u>	<u>Service Date</u>
• Tyrone Miles:	July 14, 2021
• Bryant Lowery:	July 8, 2021
• Khalil Fryer:	July 19, 2021
• Otilie Residential Treatment Facility:	July 8, 2021
• SCO Family of Services:	July 8, 2021
• Royal York Equities Corp.:	July 15, 2021
• JFK Inn:	July 16, 2021

All defendants were personally served except for JFK Inn, which was served via the Secretary of State, (and Luvasia Rodriguez, who, as noted above, has not yet been served).

Counsel for Tyrone Miles in his criminal matter spoke with me after receiving service. He advised that Mr. Miles would likely not answer the Complaint. Other than that phone

call, we have not received any answer, motion or communication from any of the other Defendants. Accordingly, all but JFK Inn and Luvasia Rodriguez are subject to default.

As the Court is aware, there is a related criminal proceeding in the Supreme Court of New York, County of Queens. That proceeding is not yet resolved. Upcoming appearance dates for the four individual defendants are: Sept. 29 for Tyrone Miles and Bryant Lowery; Oct. 27 for Luvasia Rodriguez. Defendant Fryer had his latest appearance yesterday, Sept. 15th.

Please advise whether the Court needs any additional information.

Sincerely,

A handwritten signature in dark ink, appearing to read 'Chf C', with a long horizontal flourish extending to the right.

Charles Caranicas